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14 Attorneys for Defendant
JETBLUE AIRWAYS CORPORATION

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17

18 Christopher Booher and Patricia Reid,
19 individually, on behalf of others similarly
situated, and on behalf of the general public,

20 Plaintiff,

21 vs.

22 JetBlue Airways Corporation,

23 Defendant.
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Case No. 4:15-cv-01203-JSW

**DECLARATION OF IMRAN
RAHMAN IN SUPPORT OF
DEFENDANT'S CROSS-MOTION
FOR SUMMARY JUDGMENT**

Date: May 19, 2017
Time: 9:00 a.m.
Courtroom: 5, 2nd Floor
Judge: Hon. Jeffrey S. White

DECLARATION OF IMRAN RAHMAN

I, Imran Rahman, hereby declare as follows:

1. I am employed by Defendant JetBlue Airways Corporation ("JetBlue") as Manager, Dispatch Standards. I make this declaration in support of JetBlue's Cross-Motion for Summary Judgment. I am familiar with the facts and circumstances set forth in this declaration, and I make the representations herein based upon my personal knowledge and/or based upon documents JetBlue has created and kept in the normal course of business.

2. JetBlue provides air transportation services through a route network currently serving 100 "BlueCities" located in 29 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and 21 countries.

3. JetBlue's route network takes its customers and employees through federal airspace above the continental United States, Alaska, and U.S. territories, as well as over foreign nations and international waters.

4. JetBlue's route network currently serves nine cities in California: Burbank, Long Beach, Los Angeles, Oakland, Palm Springs, Sacramento, San Diego, San Francisco and San Jose.

5. JetBlue's flights to, from and between those California cities take various routes depending on weather conditions, air traffic, and other variables. For example, JetBlue's flights from Oakland or San Francisco to Long Beach typically take a coastal route primarily over the Pacific Ocean, though may also take an inland route that includes travelling through the airspace above such landmarks as Pinnacles National Park and Carrizo Plain National Monument. In addition, those flights' ascents from or descents to San Francisco International Airport may require the aircraft to travel through the airspace above the Presidio.

6. Depending on the California origination or destination city, JetBlue's flights may also travel through the airspace above Yosemite National Park, Kings Canyon Park, the Long Beach Naval Complex, and Vandenberg Air Force Base, as well as the Pixley, Kern and Bitter Creek National Wildlife Refuges in California.

1 7. The Federal Aviation Administration (“FAA”) publishes a series of recommended
2 routes in its National Route Program. JetBlue’s route network fully complies with the FAA’s
3 National Route Program.

4 8. In 2016, JetBlue operated an average of 932 daily flights, of which an average of
5 68 (7.3%) departed from and/or landed at a California-based airport.

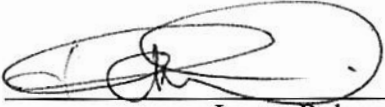
6 9. Flight Plan Manager is the software that JetBlue’s Dispatchers use to generate
7 operational flight plans for each flight JetBlue operates.

8 10. On or around January 13, 2017, I submitted a request to JetBlue’s System
9 Planning and Analysis Department to extract flight plan data from the Flight Plan Manager
10 database for all scheduled flights between the following California city pairings for the period
11 September 1, 2016 through December 31, 2016: (a) Long Beach and Oakland; (b) Long Beach
12 and San Francisco; and (c) Long Beach and Sacramento. For each flight, the extracted flight plan
13 data included: (a) the departure date; (b) the plane’s registration number; (c) the flight number;
14 (d) the departure and destination airports; (e) the Standard Instrument Departure procedure; (f) the
15 Standard Arrival procedure; (g) the route number; and (h) the Route text, which provides the
16 scheduled route path from the departure airport to the destination airport.

17 11. On or around January 13, 2017, I also went into the Sabre Remote Information
18 System and extracted the graphical depictions of the scheduled Routes depicted in the extracted
19 flight plan data. For example, on November 7, 2016, Flight Number 1435 from San Francisco to
20 Long Beach was scheduled to fly the San Francisco-Long Beach route 1. Attached as **Exhibit A**,
21 is the graphical depiction of route 1, which is a coastal route primarily over the Pacific Ocean. Of
22 the 475 flights scheduled to fly from San Francisco to Long Beach between September 1, 2016
23 through December 31, 2016, 454 were scheduled to fly the same route. As another example, on
24 November 1, 2016, Flight Number 247 from Oakland to Long Beach was scheduled to fly the
25 Oakland-Long Beach route 1. Attached as **Exhibit B**, is the graphical depiction of that route 1,
26 which is a coastal route primarily over the Pacific Ocean. Of the 546 flights scheduled to fly
27 from Oakland to Long Beach between September 1, 2016 through December 31, 2016, 366 were
28 scheduled to fly the same route.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States that the foregoing is true and correct.

3 Executed on March 17, 2017, at Long Island City, New York.

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